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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GGCC, LLC, an Illinois Limited Liability
Company, Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

DYNAMIC LEDGER SOLUTIONS, INC., a
Delaware Corporation, TEZOS STIFTUNG, a
Swiss Foundation, KATHLEEN BREITMAN, an
Individual, and ARTHUR BREITMAN, an
Individual,

Defendants.

Case No. 3:17-cv-06779-RS

CLASS ACTION

**DECLARATION OF ROSEMARY M.
RIVAS IN SUPPORT OF
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES SHOULD
BE RELATED**

The Honorable Richard Seeborg

Action filed: November 26, 2017

[Caption continues on next page.]

This document also relates to:

ANDREW OKUSKO, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC., THE
TEZOS FOUNDATION, KATHLEEN
BREITMAN, ARTHUR BREITMAN, and
TIMOTHY DRAPER,

Defendants.

Case No. 3:17-cv-06829-SI

The Honorable Susan Illston

Action filed: November 28, 2017

I, Rosemary M. Rivas, declare as follows:

1. I am a member in good standing of the Bar of this Court, and a partner in the law firm of Levi & Korsinsky, LLP, counsel for Plaintiff Andrew Okusko in the above-captioned action (“*Okusko* Action”). This declaration is based on my own personal knowledge and/or the firm’s records of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. I submit this Declaration in Support of Plaintiff’s Administrative Motion to Consider Whether Cases Should Be Related.

3. The *Okusko* Action was filed in this District on November 28, 2017, and has been assigned to the Honorable Susan Illston. *GGCC, LLC v. Dynamic Ledger Solutions, Inc., et al.* (“*GGCC* Action”), filed in this District on November 26, 2017, is currently pending before this Court.

4. The *Okusko* Action and the *GGCC* Action are both actions filed against the same defendants for violations of Sections 12(a)(1) and 15(a), 15 U.S.C. §§ 77l(a)(1), 77o(a), of the Securities Act of 1933. Specifically, both actions allege that defendants violated the federal securities laws by offering and selling unregistered securities in connection with the Tezos initial coin offering. Relating the cases will avoid undue burden and cost to the Court and the parties, and will avoid the potential for conflicting results.

5. Defendants have not yet appeared in either Action, as these cases were only recently filed. Accordingly, a stipulation could not be obtained under Civil Local Rule 7-12.

6. Concurrently with the filing of this Administrative Motion, Defendants will be served with copies of this motion and all supporting documents filed with it.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct. Executed on November 30, 2017, in San Francisco, California.

/s/ Rosemary M. Rivas
Rosemary M. Rivas